

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION**

DANIELLE SEAMAN, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

DUKE UNIVERSITY; DUKE
UNIVERSITY HEALTH SYSTEM; THE
UNIVERSITY OF NORTH CAROLINA
AT CHAPEL HILL; THE UNIVERSITY
OF NORTH CAROLINA SCHOOL OF
MEDICINE; THE UNIVERSITY OF
NORTH CAROLINA HEALTH CARE
SYSTEM; AND WILLIAM L. ROPER;
and DOES 1-20,

Defendants.

Case No. 1:15-cv-00462

**PLAINTIFF'S MOTION FOR
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

Fed. R. Civ. P. 23

TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiff Danielle Seaman, M.D., hereby moves the Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of an order finally approving the Settlement with Defendants the University of North Carolina at Chapel Hill, the University of North Carolina School of Medicine, the University of North Carolina Health Care System, and William L. Roper ("Settling Defendants"), specifically:

1. finding that the Settlement is fair, reasonable, and adequate within the meaning of Rule 23(e) of the Federal Rules of Civil Procedure and directing its consummation pursuant to its terms;
2. finding that the notice provided to the Settlement Class constitutes due, adequate, sufficient notice, and meets the requirements of due process and applicable law;
3. directing that this action be dismissed with prejudice as against the Settling Defendants;
4. approving the release of claims as specified in the Settlement as binding and effective;
5. reserving exclusive and continuing jurisdiction over the Settlement and Consent Decree; and
6. directing that final judgment of dismissal be entered as between Dr. Seaman, the Settlement Class, and Settling Defendants.

This motion is based on the accompanying memorandum of points and authorities; the Declaration of Dean M. Harvey; all exhibits to such documents; the pleadings and other documents on file in this consolidated action; and any argument that may be presented to the Court.

This the 14th day of December, 2017.

/s/ *Robert M. Elliot*

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Counsel for Dr. Seaman and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

This the 14th day of December, 2017.

/s/ Dean M. Harvey

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